

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Bernadette Cecilia Abraham

Plaintiff

v.

**American Home Mortgage
Servicing, Inc., and Deutsche Bank
National Trust Company, as Trustee for
GSAMP Trust 2004-OPT, Mortgage
Pass-Through Certificates, Series 2004-
OPT**

Defendants

C.A. No. 1:11-cv-10854-DPW

**Joint Motion for Extension of
Settlement Order of Dismissal**

On December 9, 2013, this Court extended the parties' deadline to file an Agreement for Judgment or Stipulation of Dismissal with the Court through February 7, 2014. Since that time, the parties have continued to work diligently to finalize a settlement agreement, which was finalized this week. Each party in the instant matter requests that this Court allow a further forty-five day extension of the time for compliance with the *Settlement Order of Dismissal*, to allow the parties sufficient time to execute the agreement by their authorized representatives. The parties are confident that, if they are afforded this additional time, they will be able to finally resolve this matter. Accordingly, all parties have joined this motion to extend the deadline for filing a Stipulation of Dismissal to March 24, 2014.

Respectfully submitted,

The Plaintiff,
Bernadette Cecilia Abraham,
By her Attorneys,

/s/ Danielle M. Spang
Josef C. Culik (BBO #672665)
Danielle M. Spang (BBO #684365)
CULIK LAW pc
18 Commerce Way, Suite 2850
Woburn, MA 01801
Tel: (617) 830-1795
Fax: (617) 830-1576
jculik@culiklaw.com
dspang@culiklaw.com

The Defendants,
Deutsche Bank National Trust Company,
as Trustee for GSAMP Trust 2004-OPT,
Mortgage Pass-Through Certificates,
Series 2004-OPT and Homeward
Residential, Inc. f/k/a American Home
Mortgage Servicing, Inc.,
By their Attorneys,

/s/ Jennifer S. Bunce-Madjarev
Maura K. McKelvey, BBO #600760
Ranen Schechner, BBO #655641
Jennifer S. Bunce-Madjarev, BBO #663348
Hinshaw & Culbertson LLP
28 State Street, 24th Floor
Boston, MA 02109-1775
Tel: (617) 213-7000
Fax: (617) 213-7001
mmckelvey@hinshawlaw.com
rschechner@hinshawlaw.com
jmadjarev@hinshawlaw.com

Dated: February 6, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants, if any, on February 6, 2014.

/s/ Danielle M. Spang
Danielle M. Spang